

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING FOAMS
PRODUCTS LIABILITY LITIGATION

Master Docket No.: 2:18-mn-2873-RMG

This document relates to:

See Exhibit A Attached Hereto

**STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs in the actions identified in Exhibit A attached hereto and Defendants Tyco Fire Products LP (“Tyco”), Chemguard, Inc. (“Chemguard”), and ChemDesign Products, Inc. (“ChemDesign”) hereby stipulate and agree to a dismissal with prejudice of all Plaintiffs’ Claims against Tyco, Chemguard, ChemDesign, and any other Released Parties¹ in the actions identified in Exhibit A pursuant to Plaintiffs’ decision to participate in the Settlement Agreement Between Public Water Systems and Tyco dated April 12, 2024 (the “Settlement Agreement”), which received final approval on November 22, 2024, from the Court overseeing *In Re: Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2:18-mn-2873 (D.S.C.).

Each party shall bear its own costs.

¹ Unless otherwise indicated, all capitalized terms in this motion have the meaning given to them in the Settlement Agreement.

Dated: April 25, 2025

/s/Andrew Croner

Andrew Croner
NAPOLI SHKOLNIK, PLLC
360 Lexington Avenue, 11th Fl.
New York, New York 10017
(212) 397-1000
acroner@napolilaw.com

Counsel for Plaintiffs Listed on Exhibit A

Respectfully submitted,

/s/ David E. Dukes

David E. Dukes
Nelson Mullins Riley & Scarborough LLP
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
david.dukes@nelsonmullins.com
(803) 799-2000

/s/ Liam J. Montgomery

Liam J. Montgomery
WILLIAMS & CONNOLLY LLP
680 Maine Ave SW
Washington, DC 20024
(202) 434-5000
lmontgomery@wc.com

*Counsel for Defendants Tyco Fire Products LP
and Chemguard, Inc.*

/s/ Jonathan B. Blakely

Jonathan B. Blakley
Gordon Rees Scully Mansukhani
One North Wacker, Suite 1600
Chicago, IL 60606
(312) 619-4915
jblakley@grsm.com

Counsel for ChemDesign Products, Inc.